

EXHIBIT 6

***UNREDACTED VERSION
OF DOCUMENT
SOUGHT TO BE SEALED***

EXHIBIT 6

From: Rachael Meny <Rmeny@kvn.com>

To: Leah Bijens [REDACTED], Kevin Vosen [REDACTED]

Cc: Johan Berggren [REDACTED], April Beaupain [REDACTED], Joanne Chin [REDACTED]

Michael Pfyl [REDACTED], Michelle Ybarra <MYbarra@kvn.com>, Kristinn Gudjonsson [REDACTED]

Subject: RE: Levandowski/Otto Investigation -- Prioritization of forensic review -- Privileged

Sent: Fri, 26 Aug 2016 00:31:39 +0000

REDACTED - PRIVILEGE

Rachael

Rachael Meny
Attorney at Law

KEKER & VAN NEST LLP

415 676 2245 direct | vCard | rmeny@kvn.com
633 Battery Street, San Francisco, CA 94111-1809 | 415 391 5400 main | kvn.com

From: Leah Bijens [mailto:[REDACTED]]

Sent: Thursday, August 25, 2016 5:27 PM

To: Kevin Vosen

Cc: Rachael Meny; Johan Berggren; April Beaupain; Joanne Chin; Michael Pfyl; Michelle Ybarra; Kristinn Gudjonsson

Subject: Re: Levandowski/Otto Investigation -- Prioritization of forensic review -- Privileged

Hi Kevin,

Not sure if we finalized this yet or not.

REDACTED - PRIVILEGE

Thanks,
Leah

Leah Bijens | Global Security Investigations | [REDACTED]

On Thu, Aug 25, 2016 at 10:57 AM, Kristinn Gudjonsson [REDACTED] wrote:
Hi

Sorry for not responding earlier.

So we've been adjusting the keyword list to be easier for machine searching and we are about to start using it on those machines that the processing is done for, and then we are starting processing on other machines that have been imaged.

We are essentially running our internal tooling for [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

On Wed, Aug 24, 2016 at 11:21 PM Rachael Meny <Rmeny@kvn.com> wrote:

Thanks Kristinn! I was just adding Johan as I noticed that I'd responded to a thread before you added him. So appreciate your adding him here. Also appreciate the information.

REDACTED - PRIVILEGE

Rachael
Keker & Van Nest LLP

From: Kristinn Gudjonsson [REDACTED]
Sent: Wednesday, August 24, 2016 11:11 PM
To: Kevin Vosen; Rachael Meny; Johan Berggren
Cc: April Beaupain; Joanne Chin; Leah Bijmens; Michael Pfyl; Michelle Ybarra
Subject: Re: Levandowski/Otto Investigation -- Prioritization of forensic review -- Privileged

Adding Johan to this thread again, allowing him to pitch in since he is taking over until tomorrow.

We are currently in the process of gathering machines, imaging them and processing. What processing means is to extract all meaningful timelines that can be searched using these keywords. By glancing over the keyword file i noticed many too broad search terms that would make this search hard, we are going to create a more narrow/specific list for the first batch of searches. If that reveals anything we dig deeper into that aspect, which might lead to new keywords to be added. There should be a status update on our end around 9am tomorrow morning (pdt). Then we'll know more and MTV takes over again and continues with the process. But the keyword file will be a dynamic one that can change during the course of the investigation depending on what we find.

On Wed, Aug 24, 2016, 22:50 Kevin Vosen [REDACTED] wrote:
I agree. Thx.

Typos courtesy of my iPhone.

On Aug 24, 2016, at 10:37 PM, Rachael Meny <Rmeny@kvn.com> wrote:

Kevin:

On your last question below (which I've highlighted below), here's my recommendation.

Right now, the search term list does not have a search term that would allow us to review all emails or other communications between/among the listed Chauffeur to Otto employees during X weeks leading up to their respective resignations.

I do think that this search might be useful to run, if there's a limited set of well defined weeks in which we're running it. But, given the number of employees and ex-employees involved, I worry that this type of search will require review of a lot of emails and significantly slow down the email review process.

Also, the currently existing search terms already include: a) Anthony's personal email address; b) [REDACTED] etc. Given this, I think that the current searches we are running should hit upon at least some of the key solicitation communication emails that this broader search would hit.

Thus, unless internal Google folks think we should run all email searches at one time just to be done with them, my recommendation would be that we hold off on this broad search for the next few days. This will allow us to wait to see what the initial search term result list looks like, how many email hits are coming up as a result of that, and whether we are finding any of these types of emails with the searches I mention in paragraph above. Depending on the results of that initial search, I am hopeful that we would be able to find some useful information that would allow us to narrow or better target.

One caveat to all of this is that it is likely worth including something in Kristinn's review of ex-employee's computers/devices to try and search for this type of information on their devices, web history, fragments, etc. That's because I suspect that any review of devices is something that makes sense to do only one time and, when done on a device by device basis, I think this type of search would yield a much smaller number of results.

[REDACTED - PRIVILEGE]

Rachael
Keker & Van Nest LLP

From: Kevin Vosen [mailto:[REDACTED]]

Sent: Wednesday, August 24, 2016 9:45 PM

To: Leah Bijmens

Cc: Kristinn Gudjonsson; Rachael Meny; Joanne Chin; Michael Pfyl; Michelle Ybarra; April Beaupain

Subject: Re: Levandowski/Otto Investigation -- Prioritization of forensic review -- Privileged

My last question below is still open. Thoughts?

On Wed, Aug 24, 2016 at 7:53 PM, Kevin Vosen [REDACTED] wrote:
I added some comments to the search term docs for the group's review.

I think including Sebastian makes sense. My understanding is that Anthony and Sebastian are close co-investors and business partners, so we may find communications about side businesses.

We'll be able to review results for each individual search term, right? I want to make sure the results of the narrow, targeted searches don't get lost in the results of the broad searches.

[REDACTED - PRIVILEGE]

-KV

On Wed, Aug 24, 2016 at 7:25 PM, Leah Bijmens [REDACTED] wrote:
I am also good with the search terms. I defer to Kevin for anything regarding Kitty Hawk or Sebastian Thrun.

Thanks,
Leah

Leah Bijmens | Global Security Investigations | [REDACTED]

On Wed, Aug 24, 2016 at 7:24 PM, Michelle Ybarra <MYbarra@kvn.com> wrote:
Combined search term list looks great to me and my additions are in.

From: Rachael Meny
Sent: Wednesday, August 24, 2016 5:43 PM
To: 'Kevin Vosen'; 'Kristinn Gudjonsson'
Cc: 'Joanne Chin'; Michelle Ybarra; 'Leah Bijmens'; 'Michael Pfyl'
Subject: RE: Levandowski/Otto Investigation -- Prioritization of forensic review -- Privileged

All:

I have made revisions to the search term document on Google drive. My revisions (on pages 3-4) essentially create one suggested list from everything on pages 1-3 of the document. For many of the broader terms, I have made an effort to narrow them so that they focus on what seems relevant based on the information known to date.

Kevin/Leah/Michelle – it'd be helpful if you could look at my combined list in the search term document (pages 3-4 – called KVN list of suggested search terms (as of 8/24/16 pm) -- combines all terms above & suggests limits where appropriate)) and provide any substantive additions/edits that you think are needed.

Assuming this looks good, the right folks at e-discovery (or Kristinn's group?) should then be able to review quickly and see if there are any edits they suggest to minimize search hits and this can be finalized.

Let me know if we should discuss.

Rachael

Keker & Van Nest LLP

From: Kevin Vosen [mailto:REDACTED]
Sent: Wednesday, August 24, 2016 12:32 PM
To: Kristinn Gudjonsson
Cc: Joanne Chin; Rachael Meny; Michelle Ybarra; Leah Bijmens; Michael Pfyl
Subject: Re: Levandowski/Otto Investigation -- Prioritization of forensic review -- Privileged

We understand you need this information. Here's where we are:

-Jo is working on the prioritized list of employees and ex-employees for the forensic review.

-Rachael and Leah are evaluating whether REDACTED - PRIVILEGE

-Rachael and Leah are considering whether we need to do anything to preserve email, including whether we should issue a litigation hold.

-Rachael is working on the search terms.

Rachael, Leah and Jo, can you please fill in the details and close these issues out?

KV

Typos courtesy of my iPhone.

On Aug 24, 2016, at 12:09 PM, Kristinn Gudjonsson REDACTED wrote:

In order for us to do any proactive pulling of data we need to know which people/machine we need to take a look at. Is that list ready?

On Wed, Aug 24, 2016 at 11:30 AM Kristinn Gudjonsson REDACTED wrote:

We can do some proactive pulling of data from live hosts, given we get a list of them beforehand. But we'll also need to know more what exactly we are looking for there, we have many of the logs centrally collected, so no need there, maybe file listing and some usb/external drive artifacts and browser/chat history

On Wed, Aug 24, 2016, 11:26 Kevin Vosen REDACTED wrote:

Sorry, I mean ensuring that we retain all the information so it won't be lost.

Typos courtesy of my iPhone.

On Aug 24, 2016, at 11:17 AM, Kristinn Gudjonsson REDACTED wrote:

REDACTED - PRIVILEGE

On Wed, Aug 24, 2016, 10:46 Kevin Vosen [REDACTED] wrote:

Attorney/Client Privileged

[REDACTED - PRIVILEGE]

-KV

On Wed, Aug 24, 2016 at 10:42 AM, Kristinn Gudjonsson [REDACTED] wrote:

[REDACTED - PRIVILEGE]

On Wed, Aug 24, 2016 at 10:30 AM Kevin Vosen [REDACTED] wrote:
Jo,

Please see below. Can you please update Kristinn on this?

Thx.

-KV

On Wed, Aug 24, 2016 at 10:20 AM, Kristinn Gudjonsson [REDACTED] wrote:
ATTORNEY CLIENT PRIVILEGE

Hi

Any updates?

On Tue, Aug 23, 2016 at 4:29 PM Kristinn Gudjonsson [REDACTED] wrote:
Hi

I created documents to start our investigation, you can find them at go/mater-otto

I want to get from you few things:

- List of people I need to share these documents with
- There is this file of search

terms: [REDACTED]

[REDACTED] that needs to be finalized and be our main list of search terms

- Create a sheet in this folder that has the list of all accounts and computers and prioritize them
- Read over the created documents and edit/comment on what I'm missing there
- Take a look at the investigation lpan in the master tracking doc and comment on whether there is something missing from there

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with regards

Kristinn

p.s most likely cause for all spleling mistakes in this email results from it being written by large thumbs on a tiny mobile screen... otherwise they were written on a real keyboard and I've got no excuses


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with regards

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Kevin Vosen



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Kevin Vosen
[REDACTED]

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Kevin Vosen
[REDACTED]

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